



Kansas Department of Health and Environment
Bureau of Air and Waste Management
Forbes Field, Topeka, Kansas 66620

Hazardous Waste Generator/Transporter Compliance Inspection Report

General

Time 9:45 am Date 10-29-91

Facility Name Drew Industrial (Ashland Chemical) EPA ID No. KSD000203638

Street 3155 Fiberglass Road City Kansas City, KS Zip 66115

Mailing Address (if different than above) _____

County Wyandotte Phone (913) 621-6410

Contact(s) William E. Dame, Plant Manager

Inspector(s) Lynda R. Ramsey and Curtis Lesslie

Type of Business Mfg. water softner products

Has the company declared any information/processes as trade secrets (KSA 65-3447)?
If yes, explain.

Yes

☒ No

Industrial Wastes Generated

(List hazardous wastes first)



R00146071
RCRA RECORDS CENTER

Waste:	Chloroform from Laboratory	Freon from Laboratory
If waste is hazardous, give HW ID Number:	U044	F001
Amount generated per month:	less than one cup	less than one cup
Amount presently in storage:	less than one gallon	less than one gallon
Accumulation time:	18 months	18 months
Present disposal method:	Storing on site	Storing on site

Waste:		
If waste is hazardous, give HW ID Number:		
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:		

General Requirements (GGR)

- I. Has the facility evaluated all potentially hazardous waste(s) to determine if it is hazardous? (KAR 28-31-4(b)) Yes No
- A. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? (KAR 28-31-4(b)(3)(A)) Yes No NA
- B. If waste(s) was tested, are the results kept for three years? (KAR 28-31-4(f)(1)(C))? Yes No NA
- II. If hazardous waste(s) is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW), has written permission been obtained from the operator of the POTW? (KAR 28-31-3/40 CFR 261.4) *NPDS Permit # I 977* Yes No NA
- III. If industrial waste(s) is disposed of at a permitted sanitary landfill, has a disposal authorization been obtained? (KAR 28-29-23) Yes No NA
- A. If yes, list the authorization number(s): *To do 91-082* Yes No NA
- IV. Facility size classification:
- | | | | |
|--|--|---|---|
| <input type="checkbox"/> Not a Generator | <input checked="" type="checkbox"/> Small Qty. Generator | <input type="checkbox"/> Kansas Generator | <input type="checkbox"/> EPA Generator |
| <input type="checkbox"/> T/S/D Facility | <input type="checkbox"/> Transporter | <input type="checkbox"/> HW Burner/Marketer | <input type="checkbox"/> Used oil Burner/Marketer |

Hazardous Waste Determination Requirements: ☐ Adequate ☐ Inadequate

Notification Requirements (GGR)

- V. Has generator notified KDHE and obtained an EPA Identification Number? (KAR 28-31-4(c)) Yes No NA
- VI. Is current notification accurate? (KAR 28-31-4(c)(1)) Yes No NA
- A. Is this facility marketing (selling) hazardous waste as a fuel? Yes No NA
- B. Is this facility marketing (selling) used oil as a fuel? Yes No NA
- (If yes, to either question A or B, complete Used Oil Fuel Marketers/Blenders Checklist.)
- C. Is this facility burning hazardous waste as a fuel? Yes No NA
- D. Is this facility burning used oil as a fuel? Yes No NA

Notification Requirements: ☒ Adequate ☐ Inadequate ☐ NA

(If small quantity generator, stop here.)

MIKE HAYDEN
Governor
JACK D. WALKER M.D.
Secretary

STATE OF KANSAS



Forbes Field
Topeka, KS 66620-0001
(913) 862-9360

DEPARTMENT OF HEALTH AND ENVIRONMENT

RCRA Compliance Inspection Report

T/S/D Facilities Checklist

A. General

Date 10-29-92 Time 9:45 am EPA ID No. KSD000203638
Facility Name Drew Industrial (Ashland Chemical)
Street 3155 Fiberglass Road
City Kansas City, Kansas Zip 66115
County Wyandotte Phone (913) 621-6410
Contact William E. Dame, Plant Manager
Inspector Lynda R. Ramsey and Curtis Lesslie
Other _____

B. Activity at Site

<u>Treatment</u>	<u>Storage</u>	<u>Disposal</u>
<input type="checkbox"/> Chem/Phys/Bio Treatment	<input checked="" type="checkbox"/> Drums	<input type="checkbox"/> Incineration
<input type="checkbox"/> Filtration	<input type="checkbox"/> Pile	<input type="checkbox"/> Landfill
<input type="checkbox"/> Incineration	<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Land Treatment
<input type="checkbox"/> Recycling/Recovery	<input type="checkbox"/> Tank, Above ground	<input type="checkbox"/> Surface Impoundment
<input type="checkbox"/> Reprocessing	<input type="checkbox"/> Tank, Below ground	<input type="checkbox"/> Other ()
<input type="checkbox"/> Solvent Recovery	<input type="checkbox"/> Other ()	
<input type="checkbox"/> Thermal Treatment		
<input type="checkbox"/> Volume Reduction		
<input type="checkbox"/> Waste Oil		
<input type="checkbox"/> Other ()		

Comments: _____

C. Waste Analysis Plan

265.13

1. Does facility maintain a copy of its waste analysis plan at the facility? ☒ YES ☐ NO

A. If yes, does the plan include:

1. Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters. ☒ YES ☐ NO

2. Test methods which are used to test for these parameters. ☒ YES ☐ NO

3. Sampling method used to obtain sample. ☒ YES ☐ NO

4. Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current. ☒ YES ☐ NO

5. For off-site facilities, the waste analyses that generators have agreed to supply. YES ☐ NO ☒ NA

6. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identity of the waste designated on the manifest. YES ☐ NO ☒ NA

Waste analysis plan requirements:

☒ Adequate ☐ Inadequate

D. Security

265.14

1. Does the facility provide either of the following:

a. A 24-hour surveillance system? (T.V. monitoring or guards). YES ☐ NO ☐

b. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, T.V. monitoring, locked entrance, controlled roadway access). ☒ YES ☐ NO

2. Does the facility provide warning signs at entrances. ☒ YES ☐ NO
3. Does the facility consider itself exempt from security requirements? ☒ YES ☐ NO

Security requirements:

☒ Adequate ☐ Inadequate ☐ Not Applicable

E. General Inspection Requirements

- 265.15
1. Does the owner/operator maintain a written schedule at the facility for inspecting:
 - a. Monitoring equipment ☒ YES ☐ NO
 - b. Safety and emergency equipment ☒ YES ☐ NO
 - c. Security devices ☒ YES ☐ NO
 - d. Operating and structural equipment ☒ YES ☐ NO
 2. Does the inspection schedule identify the types of problems which are to be looked for during the inspections? ☒ YES ☐ NO
 3. Does the owner/operator maintain an inspection log? ☒ YES ☐ NO
 - a. If yes, does the log contain the:
 1. Date and time of inspection ☒ YES ☐ NO
 2. Name of inspector ☒ YES ☐ NO
 3. Notation of observations ☒ YES ☐ NO
 4. Date and nature of repairs or remedial action ☒ YES ☐ NO

Inspection requirements:

☒ Adequate ☐ Inadequate

F. Personnel Training

- 265.16
1. Does the owner/operator maintain at the facility, the following documents and records:

- a. Job title and job description for each position related to hazardous waste management. ☒ YES ☐ NO
- b. Description of type and amount of training to be given each person. ☒ YES ☐ NO
- c. Records of training given to facility personnel. ☒ YES ☐ NO

Personnel training requirements:

☒ Adequate ☐ Inadequate

G. Requirements For Ignitable, Reactive, or Incompatible Wastes

- 265.17 1. Does the facility handle ignitable or reactive wastes? ☒ YES ☐ NO
- a. If yes, is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat? ☒ YES ☐ NO ☐ NA
2. Are smoking and open flames confined to specially designated locations? ☒ YES ☐ NO ☐ NA
3. Are "No Smoking" signs posted in hazard areas? ☒ YES ☐ NO ☐ NA
4. Does a check of these areas show any leakage or corrosion of containers? YES ☒ NO ☐ NA
5. Does a check of these areas show evidence of heat generation from interaction of incompatible wastes? YES ☒ NO ☐ NA

Ignitable, reactive, or incompatible waste requirements:

☒ Adequate ☐ Inadequate ☐ Not Applicable

H. Preparedness and Prevention

- 265.31 1. Does an inspection of the facility show any evidence of fire, explosion, or contamination? YES ☒ NO
- 265.32 2. If applicable to the facility, is the facility equipped with:
- a. Internal communication or alarm system easily accessible in case of emergency? ☒ YES ☐ NO ☐ NA
- b. Telephone, hand-held two-way radio capable of summoning emergency response personnel? ☒ YES ☐ NO ☐ NA

- | | | | | |
|--------|---|--------------------------------------|--------------------------|-------------------------------------|
| | 3. Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment provided? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | 4. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input checked="" type="radio"/> NA |
| 265.33 | 5. Is this equipment (1-4 above) tested and maintained to assure its proper operation? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| 265.35 | 6. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| 265.37 | 7. If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside facility, and possible evacuation routes? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | 8. In areas where more than one police and fire department might respond, is there one designated authority? | <input type="radio"/> YES | <input type="radio"/> NO | <input checked="" type="radio"/> NA |
| | 9. If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response contractors, and equipment suppliers? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | 10. If appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | 11. In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record? | <input type="radio"/> YES | <input type="radio"/> NO | <input checked="" type="radio"/> NA |

Preparedness and prevention requirements:

☒ Adequate ☐ Inadequate

I. Contingency Plan and Emergency Procedures

- | | | | |
|--------|---|--------------------------------------|--------------------------|
| 262.53 | 1. Is a contingency plan maintained at the facility and have copies been provided to outside agencies which may be called upon to provide emergency services? | <input checked="" type="radio"/> YES | <input type="radio"/> NO |
| 262.52 | 2. Does the plan describe arrangements made with emergency response personnel? | <input checked="" type="radio"/> YES | <input type="radio"/> NO |

- 265.55
3. Does the plan list the name(s), home address, and phone number(s) of the designated emergency coordinator(s)? ☒ YES ☐ NO
 4. Is an emergency coordinator available at all times? ☒ YES ☐ NO
 5. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? ☒ YES ☐ NO
 6. Does the plan include an evacuation plan for facility personnel? ☒ YES ☐ NO

Contingency plan and emergency procedures requirements:

☒ Adequate ☐ Inadequate

J. Manifest System, Recordkeeping, and Reporting

- 265.71
1. Does the facility receive waste from off-site? YES ☒ NO ☐
 - a. If yes, does the owner/operator sign and date each copy of the manifest and give a signed copy to the transporter? YES ☐ NO ☒ NA ☐
 - b. Does the owner/operator send a signed copy of the manifest to the generator within 30 days of the delivery? YES ☐ NO ☒ NA ☐
 - c. Does the owner/operator retain a copy of manifest? YES ☐ NO ☒ NA ☐
 2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? YES ☒ NO ☐
 - a. If yes, is the shipment accompanied by a shipping paper containing the appropriate information? YES ☐ NO ☒ NA ☐
 1. If yes, does the owner/operator sign and date the shipping paper and provide the transporter with a copy? YES ☐ NO ☒ NA ☐
 2. Does the owner/operator send a signed copy of the shipping paper to the generator within 30 days of the delivery? YES ☐ NO ☒ NA ☐
 3. Does the owner/operator retain a copy of the shipping paper? YES ☐ NO ☒ NA ☐
- 365.72
3. Has the facility received any shipments of waste which were inconsistent with the manifest? YES ☐ NO ☒ NA ☐

- 265.73
- a. If yes, was an attempt made to reconcile the discrepancy with the generator and transporter? YES NO ☒ NA
1. If no, was the Regional Administrator notified? YES NO ☒ NA
4. Does the owner/operator keep a written operating record at the facility? YES NO
- a. If yes, does the operating record include:
1. A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? ☒ YES NO NA
2. The location of each hazardous waste within the facility and the quantity at each location? ☒ YES NO NA
3. Records and results of waste analyses? ☒ YES NO NA
4. Reports and details of incidents requiring implementation of the contingency plan? ☒ YES NO NA
5. Records and results of required inspections? ☒ YES NO NA
6. Monitoring, testing, or analytical data? ☒ YES NO NA
7. Closure cost estimates (and for disposal facilities, post-closure cost estimates)? ☒ YES NO NA
- 265.76
5. Has the facility received any waste, which does not fall under the small generator exclusion, not accompanied by a manifest or shipping paper? YES ☒ NO
- a. If yes, was an unmanifested waste report submitted to the Regional Administrator? YES NO NA

Manifest system, recordkeeping, and reporting requirements:

☒ Adequate ☐ Inadequate

K. Closure and Post-Closure

- 265.112
1. Does the owner/operator have a written closure plan for the facility? ☒ YES NO
- a. If yes, does the plan include:
1. A description of how and when the facility will be closed? ☒ YES NO

2. A description of the steps necessary to completely close the facility? ☒ YES ☐ NO
3. An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the facility life? ☒ YES ☐ NO
4. A description of the steps needed to decontaminate facility equipment at the time of closure? ☒ YES ☐ NO
5. An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress? ☒ YES ☐ NO

- 265.118 2. If the facility is a disposal facility, does the owner/operator have a written post-closure plan? YES ☐ NO ☒ NA
- a. If yes, does the plan include:
1. Ground-water monitoring activities and frequencies at which they will be performed? YES ☐ NO ☒ NA
 2. Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment? YES ☐ NO ☒ NA
 3. The name, address, and phone number of the person or office to contact during the post-closure period? YES ☐ NO ☒ NA

Closure and post-closure requirements:

☒ Adequate ☐ Inadequate

L. Financial Requirements

- 265.142 1. Does the owner/operator have a written estimate of the closure cost? ☒ YES ☐ NO
- 265.143 2. Has the owner/operator established financial assurance for facility closure and notified the Regional Administrator? (Required after 7-6-82). ☒ YES ☐ NO
- 265.144 3. If the facility is a disposal facility, does the owner/operator have a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? YES ☐ NO ☒ NA

265.145

4. Has the owner/operator of the disposal facility established financial assurance for post-closure care and notified the Regional Administrator? (Required after 7-6-82)

YES NO ☒ NA

265.147

5. Has the owner/operator obtained liability insurance for sudden occurrences of at least \$1 million with an aggregate of at least \$2 million exclusive of legal defense costs? (Effective 7-15-82).
6. If the facility is a disposal facility, has the owner/operator obtained liability insurance for nonsudden and accidental occurrences of at least \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of legal defense costs? (Effective 7-15-82)

YES NO

YES NO NA

Financial requirements:

☒ Adequate ☐ Inadequate

M. Management of Containers

265.170

1. Are containers presently used to store hazardous waste?
- a. If no, do not complete questions 2-5.
- b. If yes, check condition of containers and for evidence of incompatibility of waste with containers.

☒ YES NO

Condition of Containers:

☒ Adequate ☐ Inadequate ☐ Not Applicable

265.173

2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste?

☒ YES NO NA

265.174

3. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors?

☒ YES NO NA

YES NO NA

YES NO NA

☒ Adequate ☐ Inadequate ☐ Not Applicable

Additional Information and CONCLUSIONS This facility is in the process of
closing out their hazardous waste storage area. They no longer generate
large quantities of hazardous waste. The laboratory generates small quantities
of waste freon and chloroform. This location plans to put a product tank farm
in the general vicinity of their hazardous waste storage area.



STATE OF ARKANSAS

Department of Pollution Control and Ecology

P. O. Box 8913 Little Rock, Arkansas 72219-8913

Telephone 501-562-7444

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039, Expires 9-30-90

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Olin Water Services, Olin Corp. 3155 Fiberglass Rd. Kansas City, Kansas 66115		4. Generator's Phone (913) 681-6410		A. State Manifest Document Number AR- 518382	
5. Transporter 1 Company Name ENSCO, Inc.		6. US EPA ID Number AIRD1016917481192		B. State Generator's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Transporter's ID PC 0708 H010	
9. Designated Facility Name and Site Address EnSCO, Inc. American Oil Road El Dorado, AR 71730		10. US EPA ID Number AIRD1016917481192		D. Transporter's Phone (501)-863-7173	
				E. State Transporter's ID PC H	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone (501)-863-7173	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol
a. "RC", Hazardous Waste, Solid, N.O.S. (chrome contaminated wood), ORM-E, NA9189		No.	Type		Waste No.
b. "RC", Waste Flammable Liquid, Flammable liquid, (Naphtha) N.O.S., Flammable liquid, UN 1993		0107	DM	16000	P D007
c. "RC", Waste Flammable Liquid, Flammable liquid, (chloroform, Fuel oil), UN 1993		0107	DM	13510	P D001
d.		0011	DM	50	P D018
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
11a. WMDS# 166217 11A - 51180#		EMERGENCY RESPONSE INFORMATION:			
11b. WMDS# 166221 11B - 3508#		Pat Chiusano - Olin Corp			
11c. WMDS# 166226 11C - 91#		ph. - 1800-6546-911			
if no alternate TSDF, return to generator					
15. Special Handling Instructions and Additional Information		Load# 66520 Order# 72328			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name John Marks		Signature John Marks		Month Day Year 09/19/91	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Donnie McInnis		Signature Donnie McInnis		Month Day Year 09/19/91	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19					
Printed/Typed Name BETH HOOKS		Signature Beth Hooks		Month Day Year 09/22/91	

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

LAND DISPOSAL RESTRICTION NOTIFICATION FORM

SECTION I

Manifest No.: AR - 518382

Generator Name: Old Vision Services, Old Corp.

WMDS No.(s): 166217, 166221, 166222

Address: 2155, Hughes Rd.

Completed By: John Mark

Kansas City, Kansas 66115

Title: Environmental Engr.

USEPA ID No.: 28000002635

Date: 9/19/91

(Continuation Sheets may be attached and must be numbered accordingly: Page ____ of ____)

SECTION II SPENT SOLVENT WASTES 40 CFR 268.30 AND CALIFORNIA LIST WASTES 40 CFR 268.32

(Check Here) ☐

A. Spent Solvent Wastes

The shipment, as referenced by the above manifest number, contains waste(s) corresponding to USEPA Hazardous Waste Code(s) _____

The above referenced waste(s) must be treated to meet the treatment standard expressed as Constituent Concentrations in the Waste Extract as outlined in 40 CFR 268.41(a) Table CCWE and in 40 CFR 268.43(a) Table CCW below.

Table CCWE—Constituent Concentration in Waste Extract

	Concentration (in mg/l)	
	Wastewater	Non-Wastewater
F001-F005 Spent Solvents		
Acetone	0.05	0.50
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.95
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.52	.75
Cyclohexanone	.125	.75
1,2-Dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethylbenzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.95
Methylene chloride (from the pharmaceutical industry)		
Methyl ethyl ketone	12.7	.95
Methyl isobutyl ketone	0.05	0.75
Nitrobenzene	0.05	0.33
Pyridine	0.64	0.125
Tetrachloroethylene	1.12	0.33
Toluene	0.075	0.05
1,1,1-Trichloroethane	1.12	0.33
1,1,2-Trichloro-1,2,2-Trifluoroethane	1.05	0.41
Trichloroethylene	1.05	0.95
Trichlorofluoromethane	0.057	0.091
Xylene	0.05	0.33
	0.05	0.15

Table CCW—Constituent Concentrations in Waste

1,1,2-Trichloroethane	0.030	5.80
Isobutanol	0.070	5.70
Methylene Chloride (Pharmaceutical Industry)	0.44	14.4

F001, F002, F003, F004, and F005 have treatment standards outlined in 40 CFR 268.42 and must be referenced in Section III of this form.

☐ — If indicated by "X," any or all of the above specified waste codes are referenced to Certification Statement Section VI.

"X" mark

10/20/91

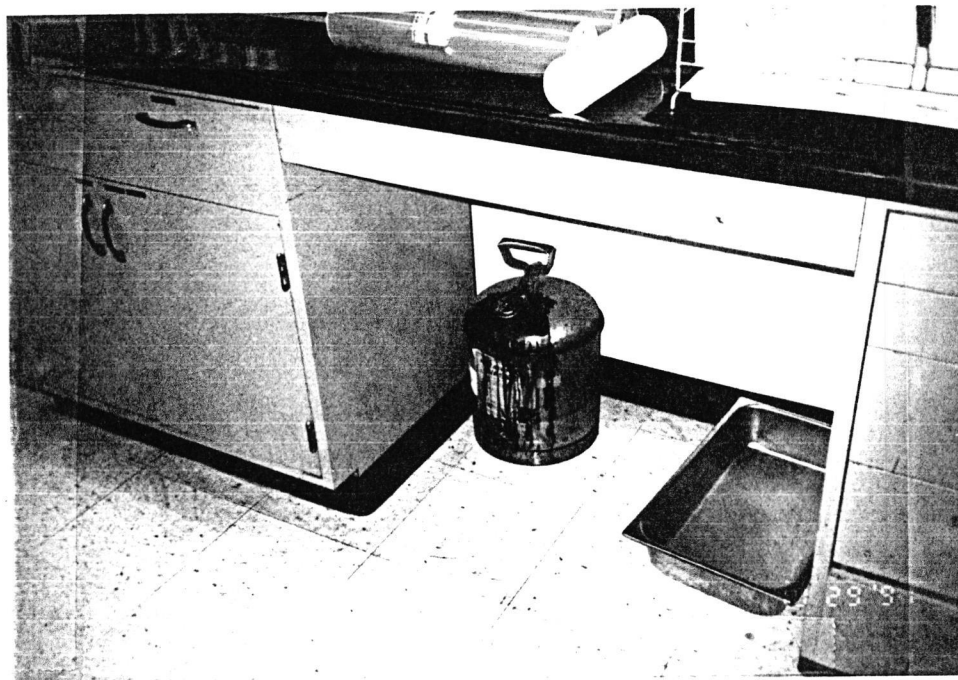
Department of Health and Environment
Division of Environment

PHOTO MOUNTING SHEET

Name of Site: Drew Industries (Ashland Chemical) EPA ID # KSD000203638
Location: City Kansas City County Wyandotte Legal 3155 Fibergalss Rd



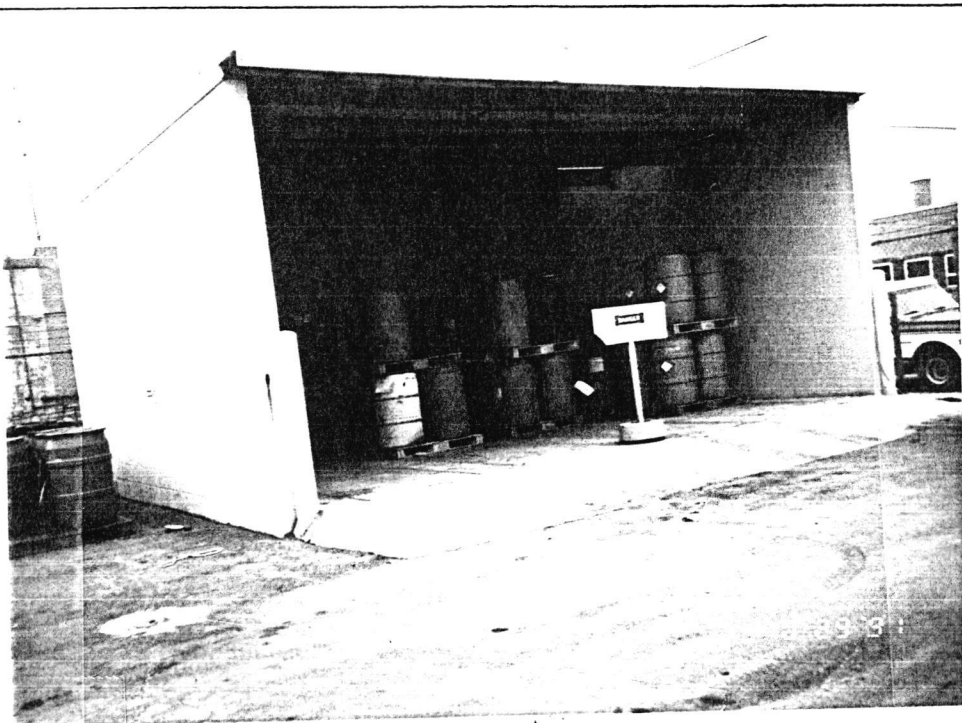
Picture No. 1
Date: 10-29-91
Time: 12:15 pm
General Direction Faced: _____
Weather Conditions: _____
Cold/Cloudy
Type of Camera: _____
35mm
Comments: Waste chloroform
in the laboratory



Picture No. 2
Date: 10-29-91
Time: 12:15 pm
General Direction Faced: _____
Weather Conditions: _____
Cold/Cloudy
Type of Camera: _____
35mm
Comments: waste freon
in the laboratory

PHOTO MOUNTING SHEET

Name of Site: Drew Industries (Ashland Chemical) EPA ID # KSD000203638
Location: City Kansas City County Wyandotte Legal 3155 Fibergalss Rd



Picture No. 3
Date: 10-29-91
Time: 12:15 pm
General Direction Faced: _____

Weather Conditions: _____

Cold/Cloudy

Type of Camera: _____

35mm

Comments: Overall view of
the hazardous waste storage
area.



Picture No. 4

Date: 10-29-91

Time: 12:15 pm

General Direction Faced: _____

Weather Conditions: _____

Cold/Cloudy

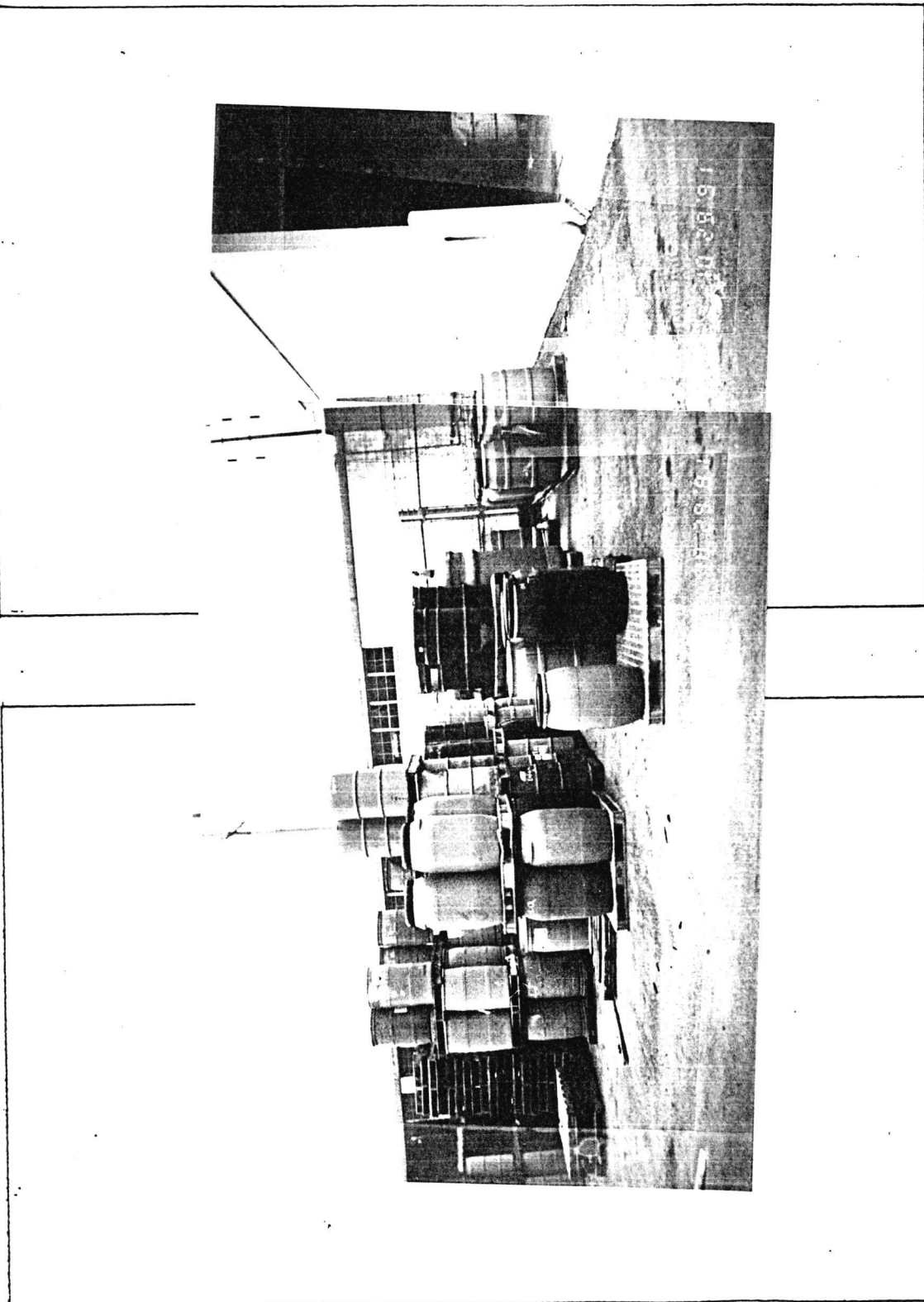
Type of Camera: _____

35mm

Comments: inside of the
hazardous waste storage
area.

PHOTO MOUNTING SHEET

Name of Site: Drew Industries (Ashland Chemical) EPA ID # KSD000203638
Location: City Kansas City County Wyandotte Legal 3155 Fibergalss Rd



Picture No. 5-6
Date: 10-29-91
Time: 12:15 pm
General Direction Faced: _____

Weather Conditions: _____
Cold/Cloudy
Type of Camera: _____
35mm
Comments: Overall view of
the 72 drums of unknowns.

Picture No. _____
Date: 10-29-91
Time: 12:15 pm
General Direction Faced: _____

Weather Conditions: _____
Cold/Cloudy
Type of Camera: _____
35mm
Comments: _____



Environmental, Health & Safety

G. W. Hammer
Vice President
(614) 889-3052

Ashland Chemical, Inc.
Subsidiary of
Ashland Oil, Inc.

Address Reply:
P.O. Box 2219
Columbus, Ohio 43216

November 19, 1991

Mr. Curtis Lesslie
Kansas Bureau of Air and Waste Management
808 West 24th Street
Lawrence, KS 66046-4417

**CERTIFIED MAIL
RETURN RECEIPT
REQUESTED**

RE: Ashland Chemical, Inc.
Drew Industrial Division
Kansas City Facility
KSD 000 203 638

Dear Mr. Lesslie:

This letter is in response to your discussion with Dan Bennewitz of Olin Chemicals on 11/14/91. The Department is requesting written confirmation that the Resinew is non-hazardous.

Ashland Chemical, Inc. acquired Olin Water Service's Kansas City facility on December 31, 1989. The purchase agreement included contractual language making Olin responsible for characterization and disposition of existing on-site materials. Olin has recently informed Ashland that the Resinew containing a 50/50 blend of Sodium Sulfite and Sodium Hydrosulfite (MSDS attached) is not a hazardous waste. It does not exhibit the characteristic of reactivity. Specifically, it does not react violently with water as evidenced by the fact that this is a water treatment chemical and water is the recommended extinguishing media. It is also not a sulfide bearing waste and contains only sulfite.

Ashland is finalizing arrangements with Olin for non-hazardous waste disposal of the seven drums of material. Please contact me at (913) 621-6410 if you have any questions.

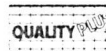
Sincerely,

William E. Dame
Plant Manager

CC: Ms. Lynda Ramsey, Kansas Bureau of Air and Waste Management

Headquarters
5200 Blazer Parkway
Dublin, Ohio 43017

Cable Address: Aroplaz OH
Telex: 245385
Answerback: ASHCHEM
Fax: (614) 793-6080



Ashland Chemical's
Commitment to
Quality and Productivity

bcc: W. Dondarski

K. Woods

K. Carter

D. Bennewitz - Olin, P.O. Box 248 Lower River Rd, Charleston, TN 37310

A. Kolarsky/File: Drew/ Kansas City/ Waste

VI - TOXICOLOGY

E NAME

OLIN RESINEX®

ACUTE ORAL LD₅₀ = No data for mixture

ACUTE DERMAL TOXICITY = No data for mixture

ACUTE INHALATION TOXICITY = No data for mixture

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE = None known

PRINCIPLE ROUTES OF ABSORPTION - Inhalation, dermal, eye, ingestion

RELEVANT SYMPTOMS OF EXPOSURE - Irritation to eyes, skin and mucous membranes. Gastrointestinal discomfort.

EFFECTS OF CHRONIC EXPOSURE - None known or reported.

CARCINOGENIC Not known to be.

MUTAGENIC Not known to be.

EYE IRRITATION Irritant

PRIMARY SKIN IRRITATION Irritant

VII - SPILL OR LEAK CONTROL PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Wear NIOSH/MSHA approved dust/mist respirator. Follow OSHA regulations for respirator use (See 29 CFR 1910.134). Wear goggles, impervious coveralls, gloves and boots. Remove all sources of ignition. Add non-combustible dry absorbent. Clean up and place in a DOT approved container. Allow to stabilize before sealing. Wash all contaminated clothing before reuse. In the event of a large spill, use the emergency telephone number shown on the front of this sheet.

WASTE DISPOSAL METHOD (FOLLOW ALL APPLICABLE LAWS & REGULATIONS - FEDERAL, STATE, & LOCAL)

Dispose of contaminated product, empty containers and materials used in cleaning up spills or leaks in a manner approved for this material. Consult appropriate federal, state and local regulatory agencies to ascertain proper disposal procedures.

VIII - REACTIVITY DATA

STABLE	X	UNSTABLE	N.A.	AT	N.A. _{IF}	N.A. _{IC}	HAZARDOUS REACTION OR POLYMERIZATION	MAY OCCUR	WILL NOT OCCUR	X
<p>CONDITIONS TO AVOID - Moisture, sparks, open flame.</p> <p>INCOMPATIBILITY (Material To Avoid) - Acids, organic or other readily oxidizable materials.</p> <p>HAZARDOUS DECOMPOSITION PRODUCTS - Sulfur dioxide</p> <p>HAZARDOUS MIXTURE OF OTHER LIQUIDS, SOLIDS, OR GASES - See Incompatibility</p>										

IX - PHYSICAL DATA

FREEZE POINT	ND °F	ND °C	SPECIFIC GRAVITY (H ₂ O = 1)	1.41	VOLATILES	None	WT. %
BOILING POINT	ND °F	ND °C	SOLUBILITY IN WATER	Appreciable	PH (1 % SOLUTION) =	7.8	
APPEARANCE	Cream colored powder				ODOR	Odorless	
CORROSIVE ACTION ON MATERIALS			OTHER				
AT 130° FOR 7 DAYS							
MILD STEEL (SAE 1020) =		ND	MPY				
ALUMINUM (7075-T6) =		ND	MPY				
STAINLESS STEEL (304) =		ND	MPY				

X - OTHER PRECAUTIONS

OSHA Classification: Flammable solid

TOXICOLOGY INFORMATION BY: S. J. Barbee, Ph.D.,
Toxicologist, Dept. of Environmental Hygiene & Toxicology
EMERGENCY PHONE: (203) 789-5435

OTHER INFORMATION BY: L. M. Prouty,
Regulatory Affairs Specialist,
Olin Water Services
EMERGENCY PHONE: 1-800-432-6546



Environmental, Health & Safety

G. W. Hammer

Director

(614) 889-3052

Ashland Chemical, Inc.

Subsidiary of

Ashland Oil, Inc.

Address Reply:

P.O. Box 2219

Columbus, Ohio 43216

November 6, 1991

Ms. Lynda Ramsey
Kansas Bureau of Air and Waste Management
808 West 24th Street
Lawrence, KS 66046-4417

CERTIFIED MAIL
RETURN RECEIPT
REQUESTED

RE: Ashland Chemical, Inc.
Drew Industrial Division
Kansas City Facility
KSD 000 203 638

Dear Ms. Ramsey:

Per your request, enclosed is Ashland Chemical, Inc.'s inventory of containers located at the Drew Kansas City Facility. The inventory is presented as two groups, the group of 14 containers next to the hazardous waste container storage pad and the 58 containers adjacent to the waste pad. Please note that not all the containers contain waste and even fewer have hazardous wastes. Ashland notified the Bureau on 10/4/91 of our intent to initiate closure of the hazardous waste pad. In conjunction with closure, Ashland is working to expedite the removal of all the wastes identified as hazardous.

If you have any questions, please contact me at (913) 621-6410.

Sincerely,

William E. Dame

Plant Manager

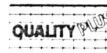
RECEIVED

NOV 8 1991

K. D. H. E.
NORTHEAST DISTRICT

Headquarters
5200 Blazer Parkway
Dublin, Ohio 43017

Cable Address: Aroplaz OH
Telex: 245385
Answerback: ASHCHEM
Fax: (614) 889-3461
(614) 889-4250



Ashland Chemical's
Commitment to
Quality and Productivity

Containers Next to Waste Storage Area
(Total = 14)

No. of Containers

Contents/Determination

2

Sand Blast Sand: Ashland has declared this material a hazardous waste for chromium content and has labeled the material as D007. Ashland's Environmental Services will remove the waste and arrange for disposal at an approved TSDF.

8

Power Blender Clean-Out Powder - This material has not been determined to be hazardous. A sample is currently being analyzed to determine if the material is hazardous or non-hazardous.

1

55 gallon drum contains two 1/2 gallon containers of OLIN 2802. This material is reworkable into product DWS 2808 and is not a waste.

2

55 gallon drums containing two 1/2 gallon containers of OLIN 3202. This material is reworkable into product DREW 3202 and is not a waste.

1

55 gallon container used for trash collection. Based on generator knowledge this material is not a hazardous waste. *empty*

Inventory Containers Adjacent to Storage Pad
(Total = 58)

<u>Container Number</u>	<u>Contents/Determination</u>
1.	Soil Boring Dirt - Non Hazardous
2.	Soil Boring Dirt - Non Hazardous
3.	Soil Boring Dirt - Non Hazardous
4.	Soil Boring Dirt - Non Hazardous
5.	Monitoring Well Water - Non Hazardous
6.	Monitoring Well Water - Non Hazardous
7.	Monitoring Well Water - Non Hazardous

Determination based on Environmental Assessment Report
Olin Water Services performed by Groundwater Technology Inc. 6/24/91
Section 7.1 "Groundwater" and Section 7.2 "Soils".

- ~~8.~~ OLIN 4150 - Antifoam Non-Hazardous
- ~~9.~~ OLIN 4150 - Antifoam Non-Hazardous
- ~~10.~~ OLIN 4150 - Antifoam Non-Hazardous
- ~~11.~~ OLIN 4150 - Antifoam Non-Hazardous
- ~~12.~~ OLIN 4150 - Antifoam Non-Hazardous
- ~~13.~~ OLIN 4150 - Antifoam Non-Hazardous
- ~~14.~~ Plastic Container Provided by vendor as a Test - filled with water. Not Waste
- ~~15.~~ Empty Drum (per regulatory definition)
- ~~16.~~ Aromatic Naptha - Raw Material infrequently used. Not Waste
- ~~17.~~ Aromatic Naptha - Raw Material infrequently used. Not Waste
- ~~18.~~ Aromatic Naptha - Raw Material infrequently used. Not Waste
- ~~19.~~ Aromatic Naptha - Raw Material infrequently used. Not Waste
- ~~20.~~ Partial drum of Aromatic Naptha - Added to Drum #19 - Now Empty
- ~~21.~~ VSR Drain Waste - Possibly contains chromium - analysis pending
- ~~22.~~ VSR Drain Waste - Added to Drum #21 - Now Empty
- ~~23.~~ Empty Drum - Return for Deposit
- ~~24.~~ Empty Drum - Return for Deposit
- ~~25.~~ Empty Drum - Return for Deposit
- ~~26.~~ Empty Drum - Return for Deposit
- ~~27.~~ Empty Drum - Return for Deposit
- ~~28.~~ Plastic Container Provided by vendor as a Test - filled with water. Not Waste
- ~~29.~~ Waste Area Clean-Up -Contains chromium - Analysis pending
- ~~30.~~ Waste Area Clean-Up -Contains chromium - Added to Drum #29-Now Empty
- ~~31.~~ Waste Area Clean-Up -Contains chromium - Added to Drum #29-Now Empty
- ~~32.~~ Waste Area Clean-Up -Contains chromium - Added to Drum #29-Now Empty
- ~~33.~~ Waste Area Clean-Up -Contains chromium - Analysis pending

Container
Number

Contents/Determination (continued)

34. VSR Drain Waste - Contains chromium - Determination will be based on Drum # 21.
35. VSR Drain Waste - Contains chromium - Determination will be based on Drum # 21.
36. OLIN 1007 - Partial container - Reworkable Material - Not Waste
37. Open-Head Container of Trash - Non Hazardous - Contents placed in dumpster.
38. Off-Spec Polymer - Non Hazardous
39. Off-Spec Polymer - Non Hazardous
40. Hydrazine - Returned to Inventory - Not Waste
41. Unknown Liquid - Analysis pending.
42. Unknown Liquid - Analysis pending.
43. Unknown Liquid - Analysis pending.
44. Cronox - Raw Material - Decision made to discard, now Hazardous Waste, D001
45. Cronox - Raw Material - Decision made to discard, now Hazardous Waste, D001
46. Endurance Oil - Unused - Returning to Oil Reclaimer 11/8/91
47. Endurance Oil - Unused - Returning to Oil Reclaimer 11/8/91
48. VSR Oil - Unused - Returning to Oil Reclaimer 11/8/91
49. VSR Oil - Unused - Returning to Oil Reclaimer 11/8/91
50. VSR Oil - Unused - Returning to Oil Reclaimer 11/8/91
51. OLIN 2002 - Product - Decision made to discard, Analysis performed 11/6/91 and material is D001 and D002.
52. OLIN 1005 - Partial Drum - Returned to Inventory - Not Waste
53. OLIN 1803 - Partial Drum - Returned to Inventory - Not Waste
54. OLIN 3002 - Partial Drum - Returned to Inventory - Not Waste
55. OLIN 2809 - Reworkable into Amersite 2 - Not Waste
56. OLIN 2809 - Reworkable into Amersite 2 - Not Waste
57. EMPTY DRUM (per regulatory definition)
58. EMPTY DRUM (per regulatory definition)

bcc: W. Dondarski
K. Woods
K. Carter
A. Kolarsky/File: Drew/ Kansas City/ Waste